UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

THIS DOCUMENT RELATES TO ALL ACTIONS AGAINST THE RIDDELL DEFENDANTS SEVERED BY THIS COURT'S DECEMBER 1, 2015 ORDER

Civil Action No. 12-md-2323 (AB) MDL No. 2323

NOTICE OF JOINDER IN PLAINTIFFS' MOTION TO REMAND SEVERED RIDDELL ACTIONS FOR LACK OF SUBJECT MATTER JURISDICTION

Plaintiffs, by and through undersigned counsel, hereby join in the motion to remand actions against the Riddell defendants that were severed by this Court's December 1, 2015 Order, filed as Document 6717 on January 18, 2016. Joining plaintiffs so move because this Court lacks subject matter jurisdiction over these actions, as explained in the Memorandum of Support which accompanied the Motion (Document 6717-3). The facts and law set forth therein apply equally to joining Plaintiffs' cases.

WHEREFORE, this Court should remand these actions to the Superior Court of California, Los Angeles County.

¹ A list of moving plaintiffs is attached herein as Exhibit A.

DATED: January 21, 2016

Respectfully submitted,

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By:

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Attorneys for Plaintiffs

EXHIBIT A to NOTICE OF JOINDER IN PLAINTIFFS' MOTION TO REMAND SEVERED RIDDELL ACTIONS FOR LACK OF SUBJECT MATTER JURISDICTION

2:12 cv 01024 Larry Barnes

Lawrence Barnes
Woodrow Bennett
Joseph Brown
Rudolph Bukich
Brian Holloway
Carolyn Lens (Gregory dec'd)
Jesse Soloman
Eleanor Perfetto (Ralph Wenzel, dec'd)
James Wilder

2:12 CV 05200 Bryan Caldwell

Pettis and Ivette Norman Charlie Phillips Severn Reece

2:12 cv 03776 William Rademacher

William Rademacher

2:12 cv 06904 Douglas Aronson

Fred and Dina Brown

2:13 cv 01790 Nickolas Bell

Nickolas and Trisha Bell

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2016, I caused the foregoing Notice of Joinder in Plaintiff's Motion to Remand Severed Riddell Actions for Lack of Subject Matter Jurisdiction to be served via the Electronic Case Filing (ECF) system in the United States District of Pennsylvania, on all parties registered for CM/ECF in the above captioned matter.

By:

David 🔌 Roser